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Attorneys for Party in Interest
Enel Green Power North America, Inc.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19 - 30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**SECOND NOTICE OF CONTINUED
HEARING ON ENEL GREEN POWER
NORTH AMERICA'S SAFE HARBOR
MOTION AND MOTION TO FILE
UNDER SEAL ORIGINALLY SET FOR
HEARING ON MARCH 26, 2019 AT 9:30
A.M.**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

New Hearing Date: **April 10, 2019**
Time: **9:30 a.m. (Pacific Time)**
Courtroom: Hon. Dennis Montali
450 Golden Gate Avenue
16th Floor, Courtroom 17
San Francisco, CA 94102

Objections Due: **April 1, 2019, 4 p.m.**
(Pacific Time)

PLEASE TAKE NOTICE that the hearing on the Motion and Memorandum for Entry of
an Order Confirming Safe Harbor Protection Under 11 U.S.C. §§ 362(b)(6) and 556 (the "Safe

1 Harbor Motion”) and the Motion to File Certain Contracts and Related Filings Under Seal (the
2 “Motion to File Under Seal,” and together with the Safe Harbor Motion, the “Motions”) filed by
3 Enel Green Power North America Inc. (“Enel”), previously scheduled for March 26, 2019 at 9:30
4 a.m. (Pacific Time), has been continued to **April 10, 2019 at 9:30 a.m. (Pacific Time)** and will
5 be held before the Honorable Dennis Montali, United States Bankruptcy Judge, in Courtroom 17,
6 United States Bankruptcy Court for the Northern District of California, 450 Golden Gate Avenue,
7 16th Floor, San Francisco, California, 94102.

8 **PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motions
9 shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local
10 Bankruptcy Rules for the Northern District of California, shall be filed with the Bankruptcy Court
11 in accordance with the customary practices of the Bankruptcy Court, and shall be served on (i) the
12 Chambers of the Honorable Judge Dennis Montali, United States Bankruptcy Court for the
13 Northern District of California, 450 Golden Gate Avenue, 16th Floor, Courtroom 17, San
14 Francisco, CA 94102; (ii) counsel for the Debtors, Weil, Gotshal & Manges, 767 Fifth Avenue,
15 New York, NY 10153-0119, Attn: Stephen Karotkin, Jessica Liou and Matthew Goren, and
16 Keller & Benvenuti LLP, 650 California Street, Suite 1900, San Francisco, CA 94108, Attn:
17 Tobias S. Keller, Jane Kim; (iii) the Office of the United States Trustee, 450 Golden Gate
18 Avenue, 5th Floor, Suite #05-0153, San Francisco, CA, 94102, Attn: James L. Snyder, Timothy
19 Laffredi; (iv) counsel for the Official Committee of Unsecured Creditors, Milbank LLP, 55
20 Hudson Yards, New York, NY 10001-2163, Attn: Dennis F. Dunne, Samuel A. Khalil; (v)
21 counsel for the Official Committee of Tort Claimants, Baker & Hostetler, LLP, 11601 Wilshire
22 Blvd., Suite 1400, Los Angeles, CA 90025-0509, Attn: Eric E. Sagerman, Lauren T. Attard; (vi)
23 counsel for the Ad Hoc Committee of Senior Unsecured Noteholders, Akin Gump Strauss Hauer
24 & Field LLP, 580 California Street, Suite 1500, San Francisco, CA 94104, Attn: Ashley Vinson
25 Crawford; (vii) counsel for Fire Victim Creditors, Danko Meredith, 333 Twin Dolphin Drive,
26 Suite 145, Redwood Shores, CA 94065, Attn: Michael S. Danko, Kristine K. Meredith, Shawn R.
27 Miller, and Corey, Luzaich, De Ghetaldi & Riddle LLP, 700 El Camino Real, PO Box 669,
28 Milbrae, CA 94030-0669, Attn: Dario de Ghetaldi, Amanda L. Riddle, Steven M. Berki, Sumble

1 Manzoor; (viii) counsel for the Ad Hoc Committee of Unsecured Tort Claimant Creditors, DLA
2 Piper LLP (US), 2000 Avenue of the Stars, Suite 400 North Tower, Los Angeles, CA 90067-
3 4704, Attn: Eric Goldberg, David Riley; (ix) counsel for the Ad Hoc Group of Institutional Par
4 Bondholders, Proskauer Rose LLP, Eleven Times Square, New York, NY 10036-8299, Attn:
5 Martin J. Bienenstock, Brian S. Rosen, Maja Zerjal; (x) counsel for Enel, Stoel Rives LLP, Attn:
6 Gabrielle Glemann (gabrielle.glemann@stoel.com), 600 University Street, Suite 3600, Seattle,
7 WA 98101; and (xi) all parties requesting notice in these chapter 11 cases pursuant to Rule 2002
8 of the Federal Rules of Bankruptcy Procedure, so as to be so filed or received no later than **4 p.m**
9 **(Pacific Time) on April 1, 2019.**

10 **PLEASE TAKE FURTHER NOTICE** that reply papers in further support of the
11 Motions must be filed and served no later than **12:00 p.m. (Pacific Time) on April 8, 2019.**

12 **PLEASE TAKE FURTHER NOTICE** that failure to properly file and serve an
13 opposition may be deemed consent to the relief requested in the Motions or a waiver of any right
14 to oppose them.

15
16 DATED: March 18, 2019

17 STOEL RIVES LLP

18 /s/ Gabrielle Glemann

19 Oren Buchanan Haker (*pro hac vice*)

20 Gabrielle Glemann (*pro hac vice*)

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27 *Enel Green Power North America, Inc.*
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